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Attorney for Plaintiff  
**WAYNE BERRY**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

**PLAINTIFF WAYNE BERRY'S MOTION FOR  
AWARD OF ATTORNEYS' FEES AND FULL COSTS**

COMES NOW, Plaintiff Wayne Berry (“Plaintiff”), by and through his undersigned counsel and hereby moves this Honorable Court for an award of

attorneys' fees and full costs. This Motion is brought on the grounds that Plaintiff has prevailed in his claim of copyright infringement and has been awarded damages as the prevailing party and therefore is entitled, subject to the Court's discretion, to an award of attorneys' fees and costs.

**A. Judgement**

The Jury Verdict was filed on March 7, 2006. The Court entered final judgment on March 9, 2006.

**B. Statutory Authority**

Plaintiff is entitled to an award of attorneys fees and costs pursuant to the Copyright Act, 17 U.S.C. § 505.

**C. Amount of Attorneys Fees**

The total amount of attorneys fees sought is \$600,000.

**D. Full Costs**

The total amount of costs is \$108,622.25.

This Motion is brought pursuant to 17 U.S.C. § 505 and Fed. R. Civ. P. 7 & 54 and L.R. 54.3 and is supported by the attached Declaration of counsel and the Exhibits attached thereto and all the records of this case, all of which are incorporated by this reference.

DATED: Honolulu, Hawai'i, March 15, 2006.

/s/ Timothy J. Hogan

TIMOTHY J. HOGAN

Attorney for Plaintiff WAYNE BERRY